

HISTORY

- Chemical Manufacturing Co.
- RCRA permit issued in 1986 for storage in drums and tanks.
- Hazardous waste storage areas closed in 1987.
- Process equipment dismantled and buildings demolished in 1987, all debris removed. Barbed wire fence erected to control entry.

CURRENT STATUS

- Where we are in the corrective action process - Attachment #I.
  - State off-site sampling 7-23/11-12-86, 4-15-87 (Determined that no widespread contamination/significant health risk).
  - EPA on-site sampling 6-11/12-87 (Determined that low levels of contamination was found on-site in G.W., soils & sediment).
  - RFA completed 1-20-88 (To determine presence/absence of release).
  - Consent order - being developed (To quantify scope & extent of releases, to develop clean-up standards, and identify potential corrective measures technologies).
- RFA Results - Attachment #II.
  - Soil, G.W., River sediment contamination.
  - Air releases off-site.
- Public Participation.
  - Public meetings, Attendees, Topics discussed.
  - Community relations plan.

FUTURE ACTIVITIES

- Resolve outstanding issues.
- March 21 (tentative) meeting with Mayor's Office & Task Force members to discuss community relations plan.
- Late March/early April public meeting to discuss issues of concern generated at previous meetings.
- Develop order & send to HQ for concurrence in April/May.

OUTSTANDING ISSUES

- Off-site soil study.
  - State conducted 3 sampling studies & determined that there is no widespread contamination/significant health risk.
  - Public feels that contamination exists - due to previous air releases and river flooding.
  - EPA must evaluate results to determine need for future study.
- Tinuvin Study.
  - Previous air releases identified.
  - Not a hazardous waste/constituent.
  - Lack of toxicity information at this time.
  - Public wants sampling and toxicity study by EPA/Ciba.
  - Ciba will not do study unless we show that it is toxic.



- Health Study of Local Residents.
  - Not within scope of the RCRA program.
  - Investigate the use of ATSDR to do study for residents.
- Atlantic Tubing Property Investigation.
  - EPA has no evidence of release/contamination at this time.
  - Public feels there are releases.
  - Should it be included in corrective action process?
  - Issues: 1) Is it part of RCRA facility; 2) Is there physical evidence of release.
- Public wants to comment on the order after negotiations & prior to signing.
  - What is public's role?
  - Possible approach: EPA will schedule public meeting to discuss content & justification for the order. Two (2) weeks prior to meeting EPA will distribute copies of order to the heads of the various committees. Significant technical public comments may be incorporated into order.

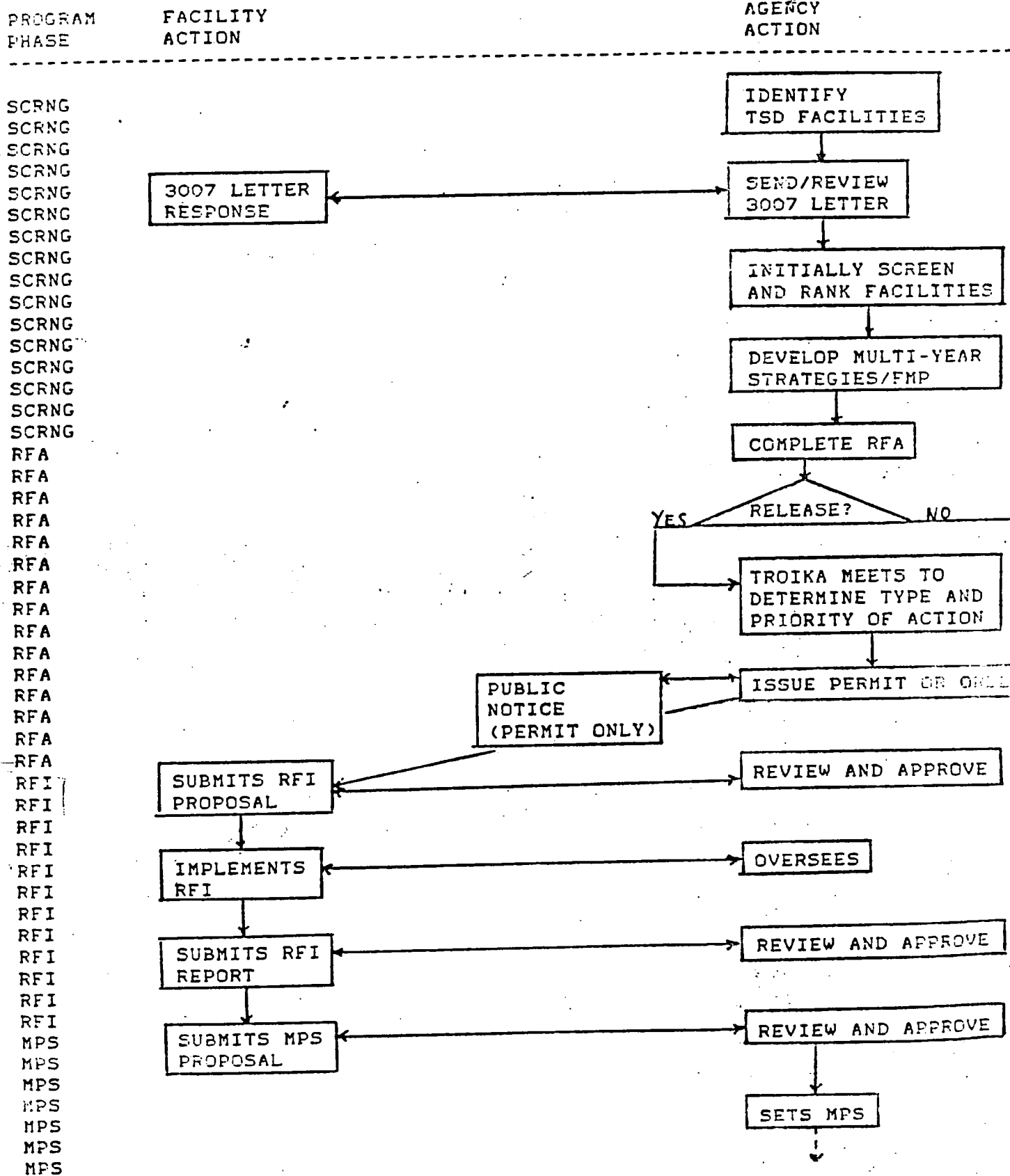
#### PUBLIC CONCERNS

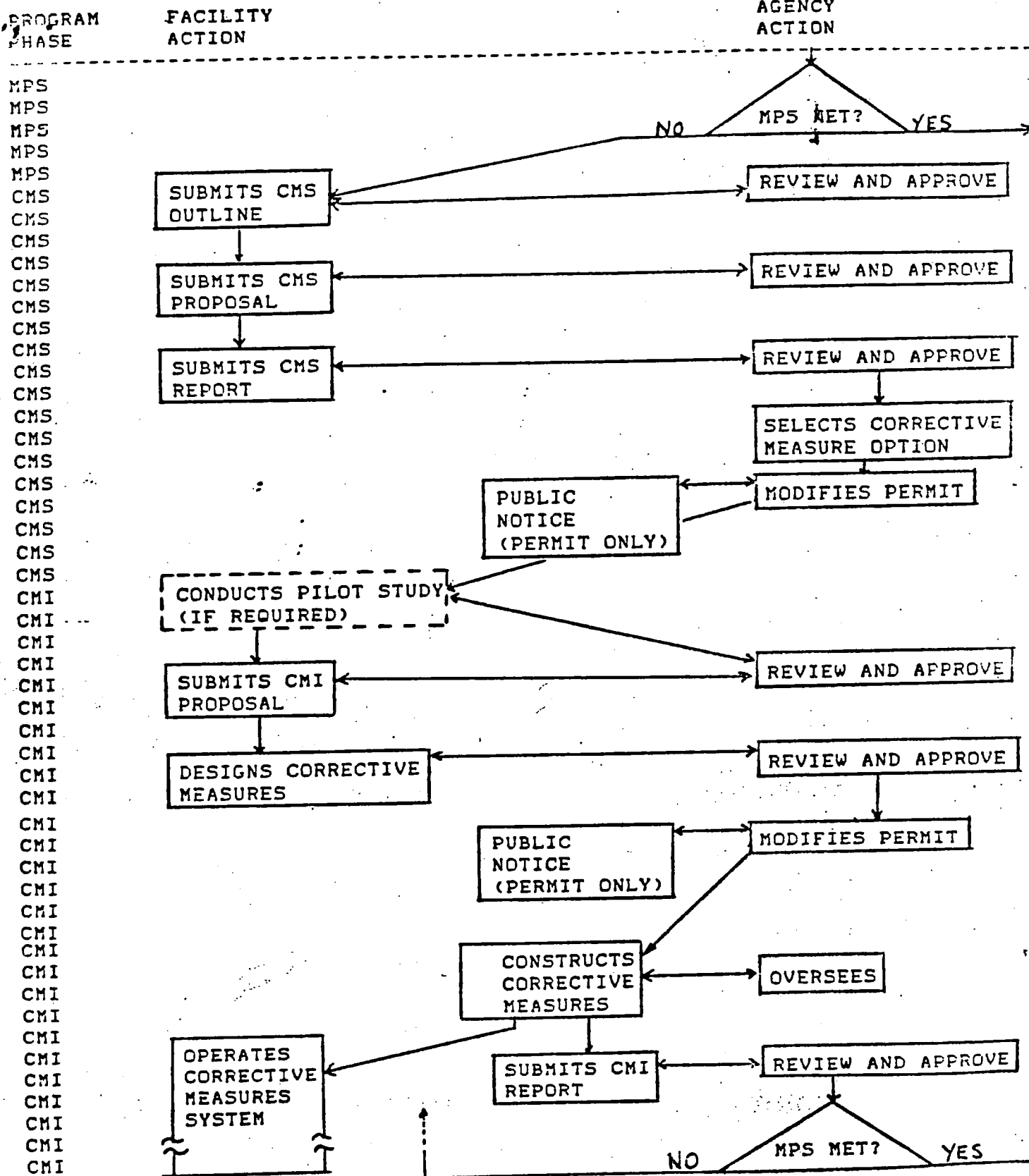
- Conduct river sediment study.
  - EPA will require Ciba-Geigy to conduct a sediment study.
- Can EPA hire a consultant to do RFI and then recover cost?
  - No. EPA has no cost recovery provisions in RCRA.
- EPA oversight activities are too limited. Public wants EPA at the site at all times.
  - EPA will devote significant resources to oversight and will treat the site as any other Enforcement/Superfund site action.
- Does EPA have authority to go back and investigate the site after corrective action is completed?
  - Yes. EPA reserves all rights to address releases, and contamination of new hazardous wastes in the future.
- Can EPA require danger signs to be posted?
  - No. EPA has no regulatory authority since the site is not active and does not pose an imminent threat to human health.
  - Currently the site has a barbed wire fence to control entry.
- Public wants a contractor certification or EPA to approve contractor.
  - EPA cannot require contractor certification in 3008(h) Order.
  - EPA does not approve contractor for doing RCRA work.
  - Any false submittals to federal agency are illegal and, therefore, subject to criminal prosecution.

ATTACHMENT I

## CORRECTIVE ACTION PROGRAM

09-Oct-





# GLOSSARY OF TERMS

## SUPERFUND EQUIVALENT

| TERM   | DEFINITION                            |       |
|--------|---------------------------------------|-------|
| TSD    | TREATMENT, STORAGE, DISPOSAL FACILITY |       |
| FMP    | FACILITY MANAGEMENT PLAN              | PA/SI |
| RFA    | RCRA FACILITY ASSESSMENT              | RI    |
| RFI    | RCRA FACILITY INVESTIGATION           |       |
| MPS    | MEDIA PROTECTION STANDARD             | FS    |
| CMS    | CORRECTIVE MEASURES STUDY             |       |
| CMI    | CORRECTIVE MEASURES IMPLEMENTATION    |       |
| CA     | CORRECTIVE ACTION                     |       |
| ORC    | OFFICE OF REGIONAL COUNSEL            |       |
| TROIKA | SITE MANAGER, SECTION CHIEF, ATTORNEY |       |
| SCRNG  | SCREENING PHASE                       |       |

## ATTACHMENT II

### RFA RESULTS

#### G.W. Contamination

- Various levels of contamination at the production area.
- Elevated levels of metals, volatile & some semi-volatile organics.
- No pesticides or PCB's.
- Downgradient samples showed higher concentrations of volatile organics indicating potential pollutant migration.

#### Sediment Contamination

- Various levels of contamination in river sediments.
- Elevated levels of metals and semi-volatile organics.
- No pesticides, PCB's or dioxin/furans.

#### Soil Contamination

- Various levels of contamination in soils around production/tank storage area.
- Elevated levels of volatile organics, semi-volatile organics & PCB's.
- No pesticides.
- Various levels of contamination in soils around SWMU #5.
- Elevated levels of metals, PCB's, and some volatile & semi-volatile organics.

#### Air Releases

- Unknown levels of tinuvin & volatile organics released on several different occasions.

#### Waste Water Treatment Plant Releases

- Various discharges on several different occasions to river and surrounding soils. Levels unknown.

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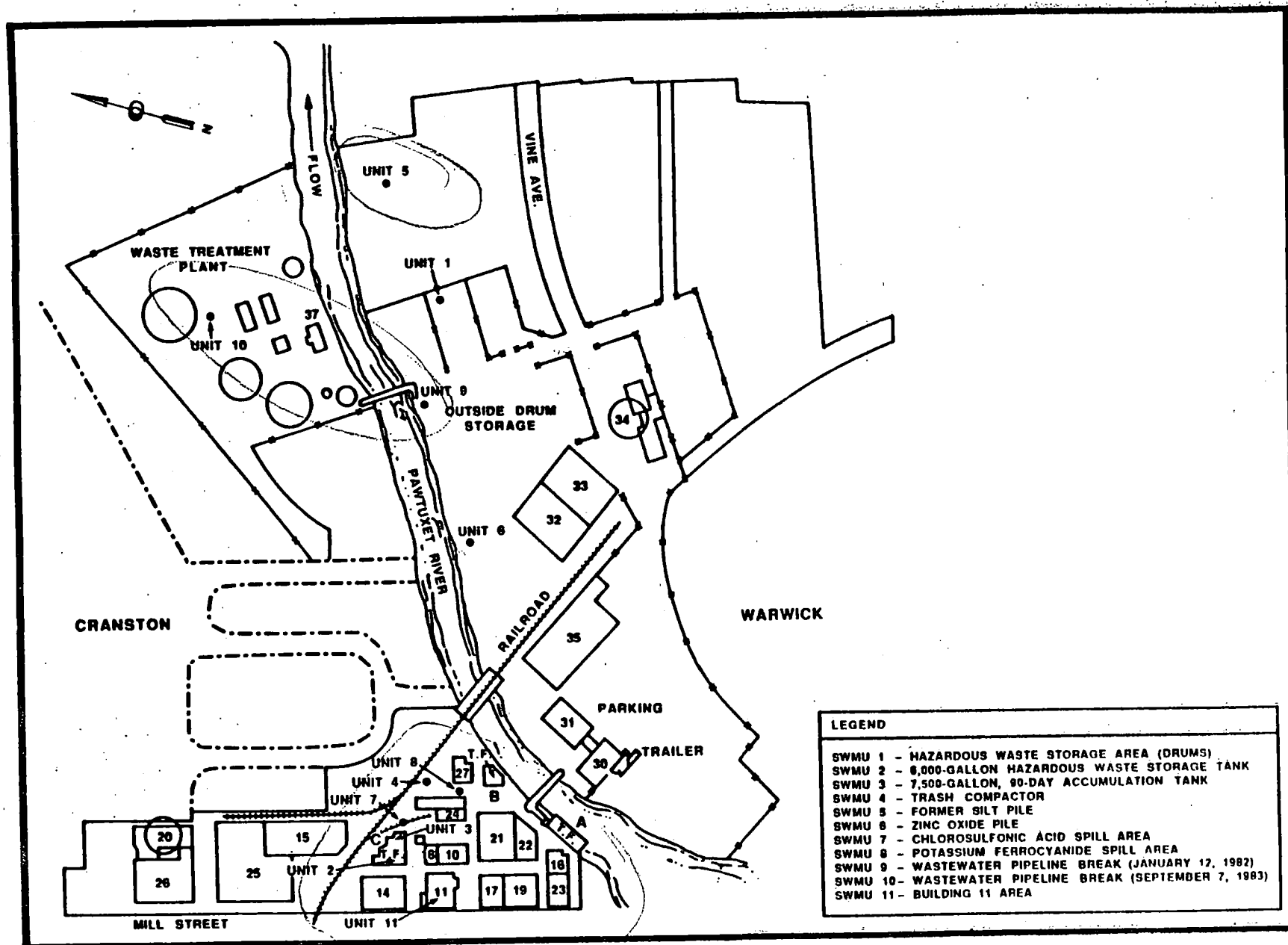


FIGURE 3. LOCATIONS OF SOLID WASTE MANAGEMENT UNITS, CIBA-GEIGY CORPORATION, CRANSTON, RHODE ISLAND (CIBA-GEIGY, 1985)

HISTORY

CALL REPORTER TO  
STRAIGHTEN OUT ARTICLES (MISCONCEPTION OF PROBLEM)

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RFA STUDY  
SAMPLING STUDY  
PUBLIC CONCERNS

MAYOR'S OFFICE  
STATE REP + SEN  
CONSULTANT  
EDGEWOOD ASSOC  
SAFER THE BAT  
PUBLIC

FUTURE ACTIVITIES

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- Develop order & send to HQ for concurrence in April/May. - HQ AFTER ORC REVIEW - WILL SIGN @ !

OUTSTANDING ISSUES

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1) ENFORCEABILITY  
2) LOOSE LANGUAGE  
3) TECHNICAL APPROPRIATE  
4) CONSIDERATION OF REGIONAL GUIDANCE

SEE  
MARY TOWN  
DURING  
C HQ

- Tinuvin Study.
  - Previous air releases identified.
  - Not a hazardous waste/constituent.
  - Lack of toxicity information at this time.
  - Public wants sampling and toxicity study by EPA/Ciba.
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SEE  
PROP ASDA



- Health Study of Local Residents.
  - Not within scope of the RCRA program.
  - Investigate the use of ATSDR to do study for residents.
- Atlantic Tubing Property Investigation. — LEVIN WILL WALK THRU @ NEXT MEETING — SEE CRAIG
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  - public feels there are releases.
  - Should it be included in corrective action process?
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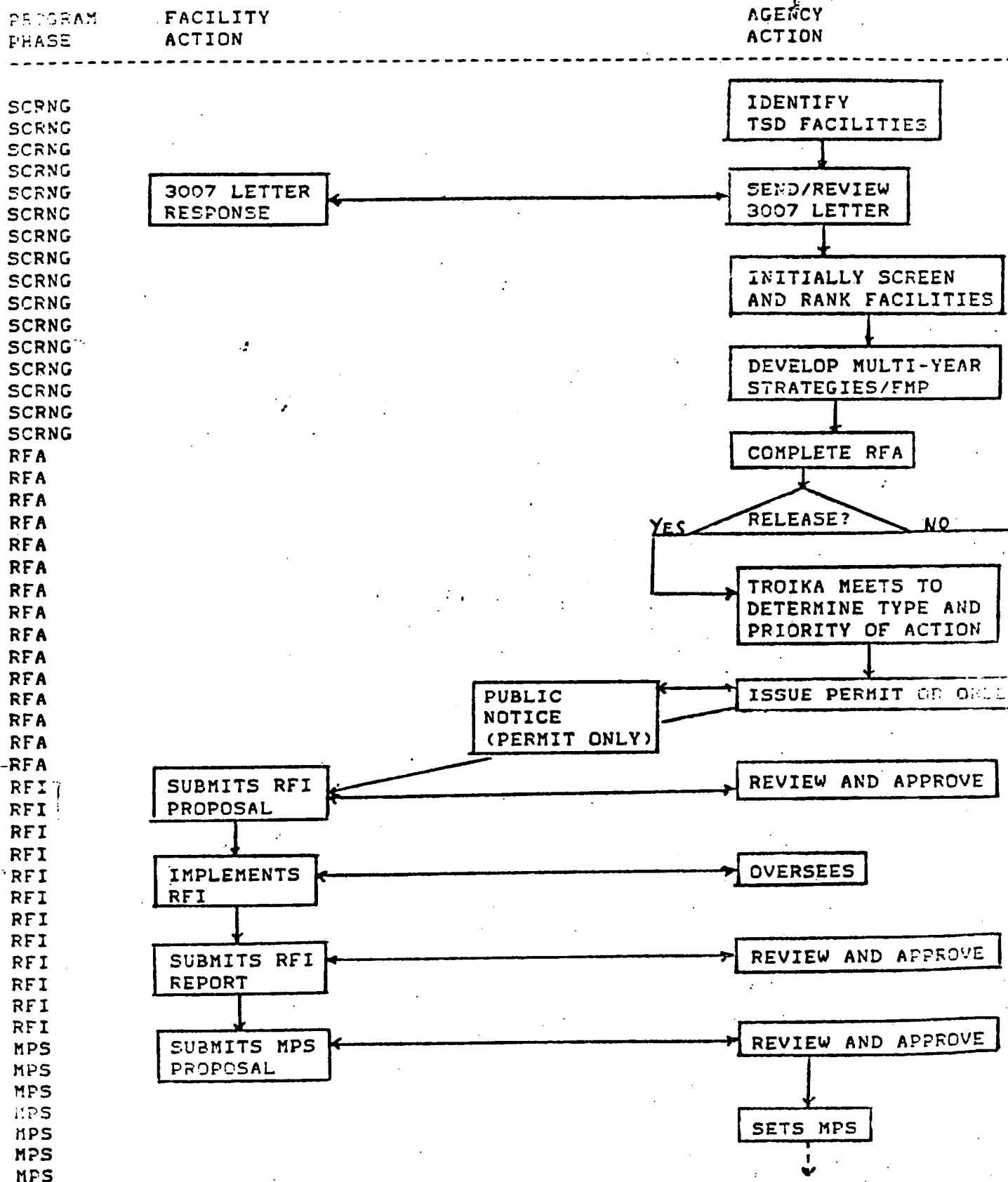
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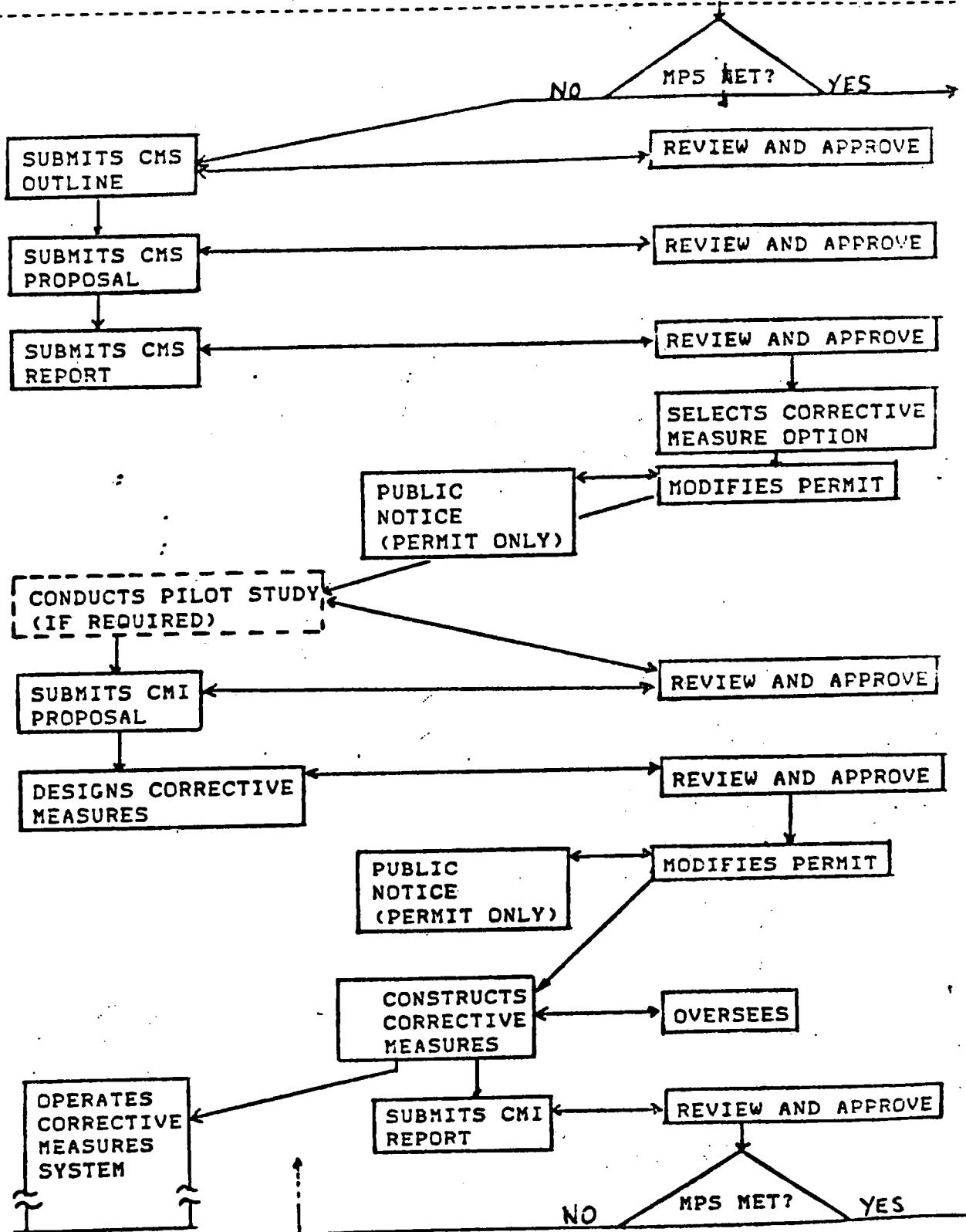
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PA/SI

RI

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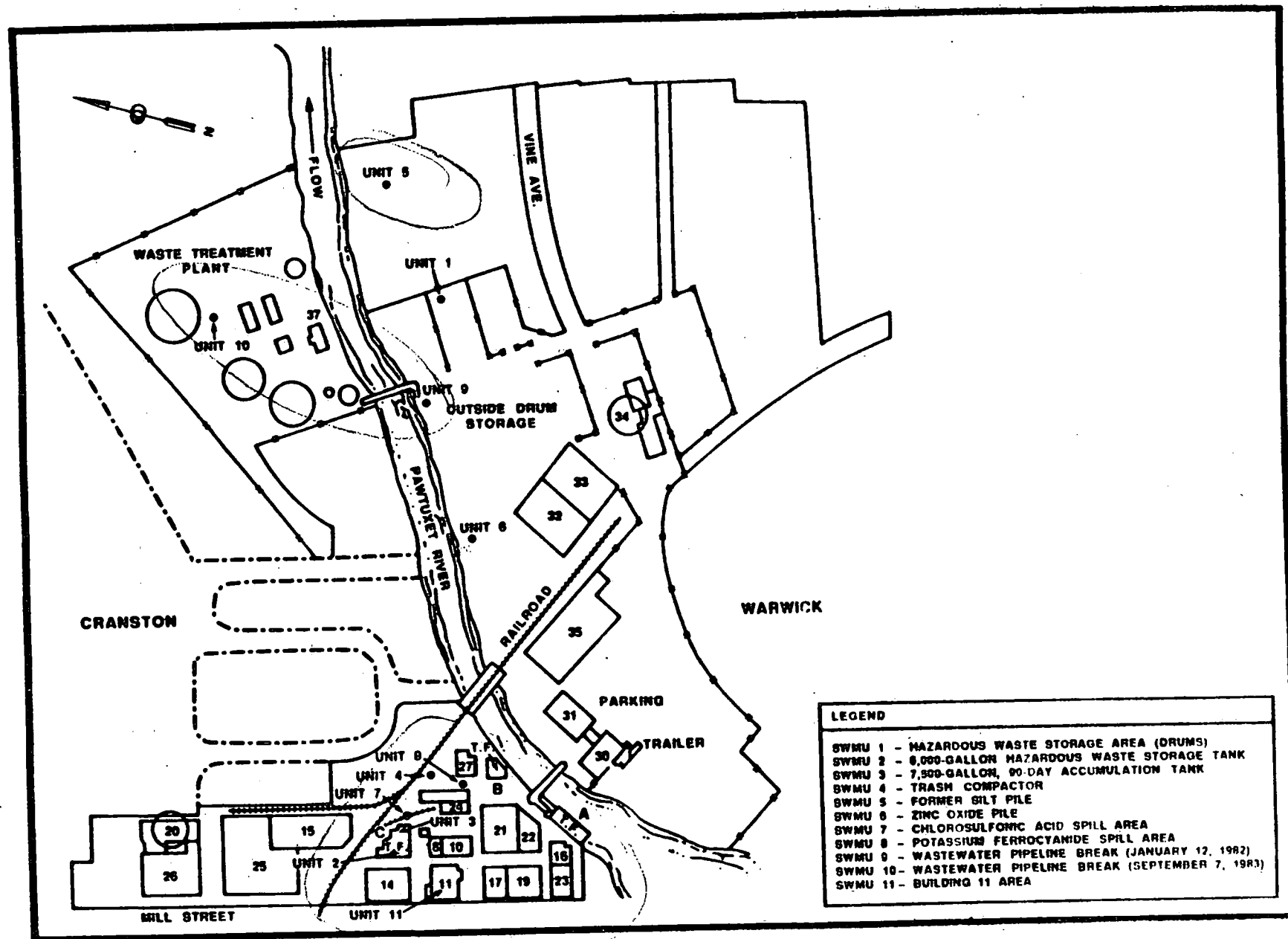


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